



## TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

[www.tdhca.texas.gov](http://www.tdhca.texas.gov)

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June 27, 2025

*Writer's direct phone # (512) 475 -3907*  
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Post Dacoma, LLC  
Los Angeles, California  
[compliance@postinvestmentgroup.com](mailto:compliance@postinvestmentgroup.com)

RE: The Dacoma

Dear Post Dacoma, LLC:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Public Facility Corporation (PFC) Audit Report submitted by Stephanie Naquin on May 30, 2025. This review was performed as required by Section 303.042 (c) of Chapter 303, the Texas Administrative Code Chapter 10, Subchapter I, and the Regulatory Agreement/Deed Restriction for The Dacoma.

Events of noncompliance have been identified and corrective action is required. The attached Findings Report details the event(s) of noncompliance and the required corrective action. This notice begins the corrective action period. Please supply all requested documentation no later than **August 26, 2025**, the last day of the corrective action period.

If clarification is necessary to complete the corrective action, contact us as soon as possible. If it is not possible to provide the requested documentation by the corrective action period, correct as much as you can and submit a corrective action plan detailing how and when the remaining issue(s) of noncompliance will be corrected.

The Department recommends submitting a cover letter explaining the documentation submitted to address each event of noncompliance. Submit corrective action to [pfc.monitoring@tdhca.texas.gov](mailto:pfc.monitoring@tdhca.texas.gov).



If you have any questions about this monitoring report, please contact Christina Thompson toll free in Texas at (800) 643-8204, directly at (512) 475-3907, or email: [christina.thompson@tdhca.texas.gov](mailto:christina.thompson@tdhca.texas.gov).

Sincerely,

A handwritten signature in black ink, appearing to be 'CT' followed by a long horizontal flourish.

Christina Thompson  
PFC Monitor

CC: [Stephanie.Naquin@novoco.com](mailto:Stephanie.Naquin@novoco.com)

**Audit Report**  
The Dacoma

The Texas Department of Housing and Community Affairs provides the following Technical Assistance:

- Annual income also includes all income derived from assets as identified and calculated in accordance with 24 CFR § 5.609(a). All income and asset sources must be properly verified and documented to ensure full compliance. The file sample revealed seventeen (17) household files where income from asset was not verified. Moving forward, failure to verify and document assets will result in a finding of noncompliance. Households with assets valued at \$51,600 or less may utilize the Asset Certification of Net Family Assets form found on the Department's website here <https://www.tdhca.texas.gov/compliance-forms> or a comparable form.
- Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit. The file sample revealed eight (8) household files where the income certification was dated after the occupancy date. Ensure initial Income Certifications are completed prior to initial occupancy in accordance with Section 3(c) of the Regulatory Agreement to maintain compliance.
- Annual Income Certifications as described in Section 3(c) of the Development's Regulatory Agreement, must be obtained on the anniversary of such Low-Income Household's occupancy of the unit, and in no event less than once in every 12-month period following each Low-Income Household's occupancy of a unit. The file sample revealed one (1) household file where the annual income certification has not been conducted. Ensure all recertifications are completed in accordance with the Regulatory Agreement to maintain compliance. Unit has been cited under a different cover on in the Details Finding Report.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION

PFC ID: A24-101-0041  
PFC User: Post Dacoma, LLC  
Property Name: The Dacoma  
Address: 3900 Dacoma St, Houston, TX 77092

Regulatory Agreement Date: 6/18/2022  
Audit Report Received Date: 5/30/2025  
Corrective Action Due Date: 8/26/2025

Audit Report Review Date: 6/23/2025

PROGRAM: PFC

PROPERTY FINDINGS

| Finding: Household above the income limit |                     |  |   |                 |
|---|---------------------|--|---|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date |
| 332                                       | 9/28/2024           | Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$64,000 , which exceeds the applicable 80% AMI income limit of \$60,560. | To correct, designate unit 332 to an non-program unit since their income exceeds the 80% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 80% AMI limit. Owner may survey existing vacant non-program units to replace unit 332 and reserve as a program-unit to be occupied with a household that income qualifies at 80% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement. |                 |

| Finding: Household above the income limit |                     |  |   |                 |
|---|---------------------|--|---|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date |
| 263                                       | 10/19/2024          | Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$47,680.88, which exceeds the applicable 60% AMI income limit of \$39,720. | To correct, designate unit 263 to an 80% AMI unit since their income exceeds the 60% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 60% AMI limit. Owner may survey existing vacant non-program units to replace unit 263 and reserve as a program-unit to be occupied with a household that income qualifies at 60% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement. |                 |

| Finding: Gross rent exceeds the highest rent allowed under the Regulatory Agreement |                     |   |  |                 |
|---|---------------------|---|--|-----------------|
| Unit #  | Non-Compliance Date | Reason  | Corrective Action  | Correction Date |
| 160   | 11/18/2024          | Unit 160 is designated as 60% AMI. The household's rent of \$1,188 exceeds the 60% AMI rent limit of \$993. | To correct, reduce the household's rent to \$993 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued). |                 |

| Finding: Household above the income limit |                     |  |  |                 |
|---|---------------------|--|--|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action  | Correction Date |
| 101                                       | 9/9/2024            | <p>In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.</p> <p>Application indicates income is received from self-employment. File contains Schedule C from the 2023 tax return. For this income verification type, two years of tax returns is required per the Development's Regulatory Agreement. The Auditor reported the income could not be determined or verified.</p> | The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review. |                 |

| Finding: Household above the income limit |                     |  |  |                 |
|---|---------------------|--|--|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action  | Correction Date |
| 233                                       | 11/23/2024          | <p>In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.</p> <p>The household reported income was being received from employment with Novetus and monthly monetary contributions. Both sources of income were not verified. Auditor reports income cannot be determined or verified.</p> | The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review. |                 |

| Finding: Household above the income limit |                     |  |  |                 |
|---|---------------------|--|--|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action  | Correction Date |
| 280                                       | 11/15/2024          | <p>In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.</p> <p>The household reported income was being received from employment with Uptown Sushi. This source of income was not verified. Auditor reports income cannot be determined or verified.</p> | The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review. |                 |

| Finding: Household above the income limit |                     |  |   |                 |
|---|---------------------|--|---|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date |
| 323                                       | 11/1/2024           | <p>In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.</p> <p>The household reported income was being received from employment. File contains one bi-weekly paystub. Regulatory Agreement required paystubs for the most recent four-week period. Auditor reports income cannot be determined or verified.</p> | <p>The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.</p> |                 |

| Finding: Household above the income limit |                     |  |   |                 |
|---|---------------------|--|---|-----------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date |
| 439                                       | 11/29/2024          | <p>In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.</p> <p>The household reported income was being received from employment with Sewa. This source of income was not verified. Auditor reports income cannot be determined or verified.</p> | <p>The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.</p> |                 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |   |  |                 |
|--|---------------------|---|--|-----------------|
| Unit #   | Non-Compliance Date | Reason  | Corrective Action  | Correction Date |
| 104  | 12/7/2024           | <p>Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.</p> <p>Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.</p> | <p>Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit to the Department for review a copy of the executed Exhibit D Income Certification form.</p> |                 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |   |   |                 |
|--|---------------------|---|---|-----------------|
| Unit #   | Non-Compliance Date | Reason  | Corrective Action   | Correction Date |
| 106  | 12/19/2024          | <p>Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.</p> <p>Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.</p> | Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit to the Department for review a copy of the executed Exhibit D Income Certification form. |                 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |   |   |                 |
|--|---------------------|---|---|-----------------|
| Unit #   | Non-Compliance Date | Reason  | Corrective Action   | Correction Date |
| 134  | 12/19/2024          | <p>Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.</p> <p>Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.</p> | Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit to the Department for review a copy of the executed Exhibit D Income Certification form. |                 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |   |   |                 |
|--|---------------------|---|---|-----------------|
| Unit #   | Non-Compliance Date | Reason  | Corrective Action   | Correction Date |
| 248  | 12/20/2024          | <p>Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.</p> <p>Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.</p> | Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit to the Department for review a copy of the executed Exhibit D Income Certification form. |                 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |   |   |                 |
|--|---------------------|---|---|-----------------|
| Unit #   | Non-Compliance Date | Reason  | Corrective Action   | Correction Date |
| 351  | 12/20/2024          | <p>Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.</p> <p>Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.</p> | Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit to the Department for review a copy of the executed Exhibit D Income Certification form. |                 |